

## **EXHIBIT 2**

### **Plaintiffs' Custodian Proposal**

- **Group A:** Senior executives currently or previously employed by Defendants, nearly all of whom were custodians during Plaintiffs' pre-Complaint investigation. Accounting for the pre-Complaint investigation, Plaintiffs seek a full custodial collection from January 1, 2015 – December 31, 2016 and January 1, 2023, through the present. Defendants agree to these custodians but refuse to produce documents prior to January 1, 2017.
- **Group B:** Employees currently or previously employed by Defendants, all of whom were custodians during Plaintiffs' pre-Complaint investigation. Accounting for the pre-Complaint investigation, Plaintiffs seek a limited custodial collection of emails and attachments from January 1, 2015 – December 31, 2016, and a full custodial collection from January 1, 2023 through the present. Defendants agree to these custodians but refuse to collect and produce documents prior to January 1, 2017.
- **Group C:** These are five senior executives currently or previously employed by Defendants who were not custodians during the pre-Complaint investigation. This group includes individuals with responsibility related to Defendants' conduct core to allegations in the Complaint that were fully covered by custodians in the pre-Complaint investigation. Plaintiffs seek a full custodial collection from January 1, 2015 through the present. Defendants do not agree to any of these custodians.
- **Group D:** Employees currently or previously employed by Defendants, most of whom were not custodians during the pre-Complaint investigation. For 11 of these individuals with an asterisk, Plaintiffs only seek a limited custodial collection for the date ranges indicated below. For 19 of these individuals, Plaintiffs seek a limited custodial collection of emails and attachments from January 1, 2015 – December 31, 2018 and a full custodial collection from January 1, 2019 to the present. Defendants agree to two of these custodians but none of the remaining individuals.
- Because several of Plaintiffs' custodian-related questions to Defendants remain outstanding, Plaintiffs request that Plaintiffs be allowed to add up to three custodians prior to January 15, 2025, and to request additional searches or collections if warranted by discovery developments.

Custodian #	Name	Custodian Group	Limited Custodial Collection Period	Relevance of Disputed Custodians
1	Ben Weeden	Group A		Undisputed
2	Bob Roux	Group A		Undisputed
3	David Marcus	Group A		Undisputed
4	Jared Smith	Group A		Undisputed
5	Joe Berchtold	Group A		Undisputed
6	Jordan Zachary	Group A		Undisputed
7	Kurt Schwartzkopf	Group A		Undisputed
8	Larry Plawsky	Group A		Undisputed
9	Mark Campana	Group A		Undisputed
10	Mark Yovich	Group A		Undisputed
11	Marla Ostroff	Group A		Undisputed
12	Matthew Hansen	Group A		Undisputed
13	Michael Evans	Group A		Undisputed
14	Michael Rapino	Group A		Undisputed
15	Michael Wichser	Group A		Undisputed
16	Omar Al-Joulani	Group A		Undisputed
17	Rick Franks	Group A		Undisputed
18	Russell Wallach	Group A		Undisputed
19	Tom See	Group A		Undisputed
20	Trevor Allin	Group A		Undisputed
21	Amy Corbin	Group B		Undisputed
22	Amy Howe	Group B		Undisputed

Custodian #	Name	Custodian Group	Limited Custodial Collection Period	Relevance of Disputed Custodians
23	Anne Paulsen	Group B		Undisputed
24	Brad Wavra	Group B		Undisputed
25	Brendan Lynch	Group B		Undisputed
26	Brian O'Connell	Group B		Undisputed
27	Casey Klein	Group B		Undisputed
28	Charlie Walker	Group B		Undisputed
29	Clay Luter	Group B		Undisputed
30	David Shipitosky	Group B		Undisputed
31	Eric Pirritt	Group B		Undisputed
32	Geni Lincoln	Group B		Undisputed
33	Geoff Carns	Group B		Undisputed
34	Geoffrey Gordon	Group B		Undisputed
35	Gerry Barad	Group B		Undisputed
36	Grant Lyman	Group B		Undisputed
37	Kurt Melien	Group B		Undisputed
38	Lesley Olenik	Group B		Undisputed
39	Rich Best	Group B		Undisputed
40	Arthur Fogel	Group C		Chairman of Global Music and President of Global Touring; information concerning promotions, amphitheater, and tying claims

Custodian #	Name	Custodian Group	Limited Custodial Collection Period	Relevance of Disputed Custodians
41	Gregory LeMay	Group C		President of company acquired by LN; information concerning all claims
42	Joe Taylor	Group C		Head of Analytics for Live Nation Venues; information concerning amphitheater and tying claims
43	John Hopmans	Group C		Executive Vice President Strategic Finance; assesses potential acquisitions in the United States; information concerning all claims
44	Patti-Anne Tarlton	Group C		Executive Vice President; works as Live Nation account lead within Ticketmaster; information concerning all claims
45	Andy Hewitt*	Group D	1/1/2016 – 12/31/2017	Prior employee who saw booking, marketing and promotion of important Live Nation venues in Southern California and Las Vegas; information concerning promotions and amphitheater claims
46	Angela Miles-Powell	Group D		Regional Vice President, Venues & Promoters; Manages primary ticketing relationships with venues, including some implicated by OVG allegations; information concerning primary ticketing and fan facing claims

Custodian #	Name	Custodian Group	Limited Custodial Collection Period	Relevance of Disputed Custodians
47	Ashley Capps*	Group D	1/1/2015 – 12/31/2017	Founder of company acquired by Live Nation; information concerning promotions and fan-facing claims
48	Bret Gallagher	Group D		Executive Vice President of Business Development; has operational and strategic responsibilities for Live Nation venue deals; information concerning promotions, amphitheater, fan-facing, and tying claims
49	Brittany Flores	Group D		Florida Region President for Live Nation; information concerning promotions, amphitheater, tying, and fan facing claims
50	Bryan Dockett	Group D		Senior Vice President of Premium Seat Services; oversees season sales and venue membership at Live Nation amphitheaters; information concerning promotions, amphitheater and tying claims
51	Charles Attal	Group D		President of C3; works on developing festivals; information concerning promotions, amphitheater, and tying claims
52	Colin Lewis	Group D		Global Tour Promoter; information concerning

Custodian #	Name	Custodian Group	Limited Custodial Collection Period	Relevance of Disputed Custodians
				promotions, amphitheater, and tying claims
53	Dan Steinberg*	Group D	1/1/2017 – 12/31/2018	Founder of company acquired by Live Nation; information concerning promotions, amphitheater, and tying claims
54	Darin Lashinsky*	Group D	5/1/2016 – 12/31/2018	President of company acquired by Live Nation; information concerning promotions, amphitheater, and tying claims
55	Fred Frank	Group D		Founder of company acquired by Live Nation; information concerning promotions, amphitheater, and tying claims
56	Gary Weinberger*	Group D	1/1/2016 – 12/31/2018	President of company acquired by Live Nation; information concerning promotions, amphitheater, and tying claims
57	Jason Wright	Group D		Midwest Region President; information concerning promotions, amphitheater, tying, and fan facing claims
58	Jenny Johnson	Group D		Vice President Commercial Strategy; information concerning primary ticketing and fan facing claims
59	Jim McNeil*	Group D	1/1/2015 – 12/31/2017	Former CEO of company acquired by Live Nation;

Custodian #	Name	Custodian Group	Limited Custodial Collection Period	Relevance of Disputed Custodians
				information concerning all claims
60	Karl Adams	Group D		Head of Large Venue Operations; oversees operations for Live Nation amphitheaters; information concerning all claims
61	Kelly Flanigan	Group D		Capital Region President; information concerning promotions, amphitheater, tying, and fan facing claims
62	Larry Frank*	Group D	1/1/2016 – 12/31/2023	Founder of company acquired by Live Nation; information concerning all claims
63	Liz Basanec	Group D		Vice President Global Pricing; responsible for U.S. ticketing pricing strategy; information concerning ticketing and fan facing claims
64	Matt Prieshoff	Group D		Head of Ancillary Experiences Venue Nation; responsible for ticketing, premier parking, and other aspects of Live Nation amphitheaters; information concerning all claims
65	Nick Checota*	Group D	1/1/2022 – 12/31/2023	Founder of company acquired by Live Nation; information concerning all claims

Custodian #	Name	Custodian Group	Limited Custodial Collection Period	Relevance of Disputed Custodians
66	Patti Kim*	Group D	1/1/2021 – 12/31/2023	Undisputed
67	Peter Conlon	Group D		Chairman, Live Nation Georgia, US Concerts; information concerning promotions, amphitheater, and tying claims
68	Ryan Vangel	Group D		New England Region President; information concerning promotions, amphitheater, and tying claims
69	Sacha Gutfreund Stone*	Group D	1/1/2015 – 12/31/2018	Founder of company acquired by Live Nation; information concerning all claims
70	Sally Williams	Group D		President of Nashville Music & Business Strategy; information concerning all claims
71	Shawn Gee	Group D		President of Live Nation Urban; information concerning promotions, amphitheater, and tying claims
72	Stacie George*	Group D	1/1/2021 – 12/31/2023	Undisputed
73	Tom McGlone	Group D		Regional Vice President Venues & Promoters; information concerning all claims
74	Velena Vego	Group D		Vice President of Third Party Programming; information

<b>Custodian #</b>	<b>Name</b>	<b>Custodian Group</b>	<b>Limited Custodial Collection Period</b>	<b>Relevance of Disputed Custodians</b>
				concerning promotions, amphitheater, and tying claims